1 RICHARD J. TROBERMAN, P.S. Attorney at Law 2 WSBA No. 6379 3 520 Pike Street, Suite 2500 Seattle, WA 98101-1385 4 Telephone: (206) 343-1111 5 Facsimile: (206) 340-1936 6 E-Mail: tmanlaw@aol.com 7 Attorney for Defendant 8 Adam Benjamin Goldring 9 10 UNITED STATES DISTRICT COURT 11 FOR THE EASTERN DISTRICT OF WASHINGTON 12 UNITED STATES OF AMERICA, 13 14 Plaintiff, No. 4:15-cr-6049-EFS-12 15 MOTION TO EXPEDITE VS. 16 **HEARING ON MOTION** 17 ADAM BENJAMIN GOLDRING. TO SUBSTITUTE COUNSEL 18 Defendant. [Without Oral Argument] 19 Hearing Date: May 24, 2017 20 COMES NOW the defendant, ADAM BENJAMIN GOLDRING, by and 21 22 through RICHARD J. TROBERMAN, P.S., and moves the Court for an order 23 expediting the time for hearing on counsel's Motion to Substitute Counsel in 24 this matter and to permit the withdrawal of attorney John Nollette. This 25 26 motion is based on the pleadings, records, and files herein, and for the reasons 27 set forth below. 28 MOTION TO EXPEDITE HEARING ON RICHARD J. TROBERMAN, P.S. ATTORNEY AT LAW MOTION TO SUBSTITUTE COUNSEL; 520 PIKE STREET, SUITE 2500 Case No. 4:15-CR-6049-EJS - 1 SEATTLE, WASHINGTON 98101-1385

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MOTION TO EXPEDITE HEARING ON MOTION TO SUBSTITUTE COUNSEL;

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An expedited hearing is necessary in this matter. This is a complex case in which 15 defendants have appeared to date, and it is anticipated that additional defendants who have been named in the indictment but have not yet been arrested may appear in the future.

Defendant Adam Goldring was arrested on March 23, 2017. On April 15, 2017, Attorney John Nollette was appointed to represent Mr. Goldring pursuant to the Criminal Justice Act. Dkt. # 375. Mr. Goldring made his initial appearance in this district on April 21, 2017. Dkt. # 382. He was ordered detained on the same date. Dkt. # 385. On April 24, 2017, the Court issued an Order Setting Pretrial Conferences and Trial to Coincide with Co-Defendants. DKT. # 387.

The discovery in this case is voluminous, and a Discovery Coordinator has been appointed. The case involves a conspiracy alleged to have commenced in 2011, and alleges conduct occurring in both the Eastern District of Washington and in Canada. Mr. Goldring has been joined for trial with 15 other defendants, many who have been involved in the case since August and September, 2016. In order to provide effective assistance of counsel and to adequately prepare for trial given the current schedule, it is incumbent upon counsel to formally appear in this case and begin preparation of Mr. Goldring's

defense as quickly as possible.

Accordingly, defendant requests that the hearing on Defendant's Motion to Substitute Counsel be expedited. No oral argument is requested on this motion.

DATED this <u>19</u> day of May. 2017.

RICHARD J. TROBERMAN, P.S.

By:

RICHARD J. TROBERMAN

WSBA #6379

Proposed Substituting Attorney for Defendant Adam Goldring

CERTIFICATE OF SERVICE

I hereby certify that on May $\frac{19}{1}$, 2017, I electronically filed the foregoing "MOTION TO EXPEDITE HEARING ON MOTION TO SUBSTITUTE COUNSEL" with the Clerk of Court using the CM/ECF system which will send notification of such filing to the attorneys of record in this case.

RÍCHARD J. TROBERMAN

MOTION TO EXPEDITE HEARING ON MOTION TO SUBSTITUTE COUNSEL; Case No. 4:15-CR-6049-EJS - 4

RICHARD J. TROBERMAN, P.S. ATTORNEY AT LAW 520 PIKE STREET, SUITE 2500 SEATTLE, WASHINGTON 98101-1385 (206) 343-1111